

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**UNITED STATES POSTAL SERVICE RESPONSE TO AMERICAN POSTAL
WORKERS UNION INTERROGATORIES REDIRECTED FROM WITNESS NERI
(APWU/USPS-T4-18-19)
(February 23, 2012)**

The United States Postal Service responds to the above-listed interrogatories from the American Postal Workers Union, redirected from witness Neri (USPS-T-4) and dated February 9, 2012. Each question is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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February 23, 2012

**INSTITUTIONAL RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO AMERICAN POSTAL WORKERS UNION INTERROGATORIES
REDIRECTED FROM WITNESS NERI**

APWU/USPS-T4-18 Did the Postal Service consider the expeditious collection, transportation and delivery of important letter mail in the development of the current proposal? If so, how was this considered?

RESPONSE

All letters in the mail are "important" in some subjective sense to their senders, to their recipients and to the Postal Service. The Postal Service does not consider that it should classify mail within a particular class or product as being more "important" than other mail within that same class or product. However, in order for the word "important" to serve a purpose other than adornment in 39 U.S.C. § 101(e) and (f), it must be used in a manner that objectively distinguishes among letters. This must be the case for First-Class Mail, which is dominated by mail pieces that are presumed to include letters sealed against inspection, making the contents unknown to the Postal Service. It is also must be the case for Standard Mail, whose senders depend just as much on the Postal Service but generally desire less expeditious delivery.

Recognizing that all letters are, in some subjective sense, important, the Postal Service does not interpret subsections 101(e) and (f) as imbuing all letters with the importance alluded to by those provisions. For purposes of these sections, the Postal Service regards as "important" those letters on which senders or recipients place such emphasis that they seek and pay for expedited delivery. Over time, senders have done so by seizing upon the delivery service advantages offered by Priority Mail and Express Mail. In other cases, recipients utilize Caller Service to expedite their access to incoming letters.

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In many circumstances, First-Class Mail users have considered that product's service levels to be sufficient for the transmission of letters they subjectively deem to be important. The same has been true for traditional Standard Mail users who sometimes deem particular mail pieces to be of such importance as to be worth the expenditure of First-Class Mail postage in order to upgrade to First-Class Mail service.

As First-Class Mail service standards are adjusted for purposes of the future network, mailers who prefer First-Class Mail for the delivery of letters they subjectively deem important may have to adjust their mailing practices in order for some letters to be delivered in time to meet certain expectations. For single-piece First-Class Mail users, it may mean mailing a letter on Monday instead of Tuesday in order to preserve a Wednesday delivery expectation, for example. For Presort First-Class Mail users seeking to preserve that same Wednesday delivery expectation, it also may mean mailing on Monday instead of Tuesday, or mailing earlier on Tuesday than is currently necessary to obtain Wednesday delivery. In some cases where mailing earlier is not an option, it may mean considering the use of an expedited service on that Tuesday.

The Postal Service expects to retain its current methods for expeditious collection, transportation and delivery of letters and does not intend to propose changes to the service standard day ranges for the products that serve as

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channels for expedited delivery. It also is preserving the current benefits of
Caller Service.

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APWU/USPS-T4-19 Did the Postal Service consider methods of transporting the mail and programs designed to achieve overnight transportation of important letter mail in the development of the current proposal? If so, how were they considered?

RESPONSE

Yes. See the institutional response to APWU/USPS-T4-18. The Postal Service uses both air and surface transportation for these purposes today and is planning to do so in the new network.